



February 14, 2013

Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commission  
445 12th Street, SW, Suite TW-A325  
Washington, DC 20554

Re: **Annual CPNI Compliance Certification, EB Docket No. 06-36**

Dear Secretary Dortch:

Attached for filing in EB Docket No. 06-36, please find the Annual 47 C.F.R. § 64.2013(e) CPNI Compliance Certificate and accompanying statement of Internet & Telephone, LLC.

If there are questions regarding this filing, please contact the undersigned. Thank you for your assistance.

Sincerely,

Paul C. Cissel



# internet & telephone

Annual 47 C.F.R. § 64.2009(e) CPNI Compliance Certification

EB Docket No. 06-36

Annual 64.2009(e) CPNI Certification for 2013

Date filed: February 14, 2013

Name of company covered by this certification: Internet & Telephone, LLC

Form 499 Filer ID: 822570

Name of signatory: Paul C. Cissel

Title of signatory: Member, CEO

I, Paul C. Cissel, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See 47 C.F.R. § 64.2001 et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken any actions against data brokers in the past year. Because the company is not aware of any activity by data brokers or pretexters with respect to its customers' CPNI during the reporting year, the company has no information to report with respect to the processes pretexters are using to attempt to access CPNI. The company's steps taken to protect CPNI are described in the accompanying statement.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

Signed

Paul C. Cissel

Internet & Telephone, LLC

2/8/2013



**Certificate to Accompany Annual 47 C.F.R. § 64.2009(e) CPNI Certification**

**EB Docket No. 06-36**

Internet & Telephone, LLC, submits this accompanying statement to explain how the company's procedures ensure that the company is in compliance with the substantive requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

**Introduction**

Internet & Telephone, LLC (the "company"), is a small, New England based company that provides managed voice and data services exclusively to small and medium sized business customers. We have approximately 350 telecommunications business customers (we have about 2700 dialup internet customers as well), served by our staff of 14 people. Because of our size and the nature of our business, our staff knows each of our customers personally, and each customer has a personal point of contact within the company, with whom they work. We do not use CPNI to market to our customers, nor do we share CPNI with any third party for marketing purposes. Rather, our only use of customer CPNI is service related. We have strict systems in place to protect the confidentiality of our customer's records. Customers desiring call detail information are directed to our secure website; we do not provide call detail records by phone, e-mail, or postal mail. Specific procedures we have in place to protect our customers' CPNI are discussed below.

**1. Compliance with § 64.2007, approval required for use of customer proprietary network information:**

The company does not use CPNI for any purpose for which customer approval (opt-out or opt-in) is required. We do not market to our customers, or share our customers' CPNI with third parties for marketing purposes.

**2. Compliance with § 64.2008, notice required for use of customer proprietary network information:**

The company does not use CPNI for any purpose for which customer approval is required. Therefore, the company is not required to provide notification of the customer's right to restrict use of, disclosure of, and access to that customer's CPNI in connection with obtaining opt-out or opt-in approval.

**3. Compliance with § 64.2009, safeguards required for use of customer proprietary network information:**

The company does not use CPNI for any purpose for which customer approval is required. Therefore, the company presumes that the customer has not given approval for use of its CPNI and does not need to specifically identify the customer's opt-out or opt-in status. Personnel are trained as to when they are and are not authorized to use CPNI, and the company has an express disciplinary process in place for noncompliance. The company does not use CPNI for marketing campaigns, so we do not keep marketing-related records regarding CPNI use.



#### **4. Compliance with § 64.2010, safeguards on the disclosure of customer proprietary network information:**

The company has physical security, information technology, and personnel measures in place to discover and protect against attempts to gain unauthorized access to CPNI. We authenticate each of our approximately 350 business telecommunications customers by referring the customer to their dedicated account representative. Our account representatives have a personal relationship with the designated customer contacts for the businesses they serve, and can recognize the contact's voice and other identifiers. If someone other than the designated customer contact calls us, we call the customer contact to determine whether the caller is authorized to communicate with us on behalf of the customer's business. CPNI is never discussed with anyone who has not been authenticated by the dedicated account representative for that customer. Call detail records are only provided to customers via the company's secure website. To access the website, the customer of record must contact us to request to be set up on the website, and must obtain a user name and password. All access to the site is logged, and senior company executives are e-mailed each time a customer account is accessed. Therefore, we have a record of everyone who accesses call detail records. Customers who forget their password are re-authenticated prior to issuance of a new password. In the event a password, online account, or address of record is created or changed, the company immediately provides notice to the customer, usually by telephone.

#### **5. Compliance with § 64.2011, notification of customer proprietary network information security breaches:**

The company has not experienced any CPNI breaches during the reporting year. However, the company has in place procedures to detect breaches and, in the event of a breach, would notify law enforcement and customers in compliance with the Commission's rules, and maintain appropriate records relating to the breach.